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and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**EX PARTE APPLICATION FOR RELIEF FROM  
LOCAL BANKRUPTCY RULE 3007-1(a)  
REGARDING DEBTORS' FIRST AND SECOND  
OMNIBUS OBJECTIONS TO CLAIMS**

[Pursuant to B.L.R. 9014-1, no hearing as to any  
specific Proof of Claim unless timely Response filed]

Date: June 24, 2020

Time: 10:00 a.m. (Pacific Time)

Place: United States Bankruptcy Court  
(Telephonic Appearances Only)

Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as  
2 debtors and debtors in possession (collectively, “**PG&E**” or the “**Debtors**”) in the above-captioned  
3 chapter 11 cases (the “**Chapter 11 Cases**”) hereby request relief from Rule 3007-1(a) of the Local Rules  
4 for the Bankruptcy Court for the Northern District of California (the “**Local Rules**”) relating to the  
5 *Debtors’ First Omnibus Objection to Claims (Duplicative, Amended and Wrong Case Claims)* [Docket  
6 No. 7550] and the *Debtors’ Second Omnibus Objection to Claims (Duplicative, Amended and Wrong*  
7 *Case Claims)* [Docket No. 7553] (together, the “**Omnibus Claims Objections**”).

8 Local Rule 3007-1(a) requires that, unless the Court orders otherwise, any claim objection must  
9 attach a copy of the claim at issue, minus any attachments or exhibits. Here, the Omnibus Claims  
10 Objections objected to more than 120 claims in total. The purpose of the Omnibus Claims Objections is  
11 to eliminate duplicate proofs of claim that are based on the same obligation of the Debtors to the claimant,  
12 and to leave in place on the claims register a single proof of claim (referred to in the Omnibus Claims  
13 Objections as a “Surviving Claim”) that will be unaffected by the objections. For this reason, the Debtors  
14 expect that there will be few if any challenges by claimants to the Omnibus Claims Objections. Should  
15 any claimants oppose the objections, the Debtors will endeavor to resolve them informally.

16 It would have been cumbersome and inefficient, and likely serve no purpose, for the Debtors to  
17 attach each claim to which objection is made, given the circumstances described above. Should the  
18 Court deny this application, the Debtors will promptly comply with Local Rule 3007-1(a) by filing copies  
19 of all referenced claims, absent their exhibits.

20 The Debtors have asked counsel for the two official committees and for the United States Trustee  
21 whether they oppose this request. Counsel for the Official Committee of Tort Claimants and for the  
22 United States Trustee have advised that they do not oppose it; counsel for the Official Committee of  
23 Unsecured Creditors have not communicated any objection.

1 WHEREFORE the Debtors respectfully request entry of an order applicable to the Omnibus  
2 Claims Objections excusing compliance with the requirement of Local Rule 3007-1(a).

3  
4 Dated: May 29, 2020

**WEIL, GOTSHAL & MANGES LLP**  
**KELLER BENVENUTTI KIM LLP**

By: /s/ Peter J. Benvenutti  
Peter J. Benvenutti

*Attorneys for Debtors and Debtors in Possession*